

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,

:

Plaintiff, : Case No. 2:20-CR-30

vs. : JUDGE GRAHAM

RADOSLAV BOEV,

:

Defendant. :

**MOTION TO CONTINUE TRIAL AND DEADLINES**

Now comes the defendant, Radoslav Boev, through counsel, pursuant to 18 U.S.C. § 3161(h)(7)(A) and moves this Court to continue trial currently scheduled for July 6, 2020, for a period of at least 60 days. Additionally, the defendant moves to extend all other dates and deadlines listed in the scheduling Order, for a period of at least 60 days. Due to the COVID-19 pandemic, counsel has not has sufficient time to meet with his client to discuss discovery materials, has not had the ability to investigate facts of the case or interview witnesses and has not been able to fully prepare for trial. Undersigned counsel submits that the requested extension would serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. §3161(h)(7)(A). AUSA Mike Hunter has been notified of this request.

Respectfully submitted,

DEBORAH L. WILLIAMS  
FEDERAL PUBLIC DEFENDER

/s/ George Chaney  
George Chaney (LA 22215)  
Assistant Federal Public Defender  
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RADOSLAV BOEV

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ George Chaney  
George Chaney